

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL, INC.,
SECURITIES LITIGATION

Civ. A. No. 3:14-cv-00682-JAG

Hon. John A. Gibney, Jr.

CLASS ACTION

**LEAD PLAINTIFFS' MEMORANDUM IN SUPPORT OF THEIR MOTION TO SEAL
MEMORANDUM OF LAW AND EXHIBITS IN SUPPORT OF THEIR MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Lead Plaintiffs Her Majesty the Queen in Right of Alberta and Fresno County Employees' Retirement Association ("Lead Plaintiffs"), by and through their undersigned counsel of record, respectfully submit this Memorandum in Support of their Motion to Seal Memorandum of Law In Support of Their Motion for Partial Summary Judgment, and the supporting Declaration of Susan R. Podolsky and accompanying exhibits.

The Parties to this action entered into a Stipulated Protective Order filed with this Court on June 25, 2015 (the "Protective Order") (ECF No. 85). Section 5.2 of the Protective Order requires a party to file under seal materials containing information designated as Confidential Discovery Material (as defined in the Protective Order). Here, Defendants have made this designation as to the documents and information contained in Lead Plaintiffs' Memorandum of Law and Exhibits supporting their Motion for Partial Summary Judgment.

Under these circumstances, Section 5.2 of the Protective Order requires that these materials be filed under seal as an initial matter.

DATED: February 12, 2016

/s/ Susan R. Podolsky

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

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